

Matthew R. Lewis (7919)  
Taylor J. Smith (17537)  
**KUNZLER BEAN & ADAMSON, PC**  
50 W. Broadway, 10th Floor  
Salt Lake City, Utah 84101  
Telephone: (801) 994-4646  
[mlewis@kba.law](mailto:mlewis@kba.law)  
[tsmith@kba.law](mailto:tsmith@kba.law)

Jason P. Gottlieb (*pro hac vice application forthcoming*)  
David E. Ross (*pro hac vice application pending*)  
Alexander R. Yarm (*pro hac vice application pending*)  
**MORRISON COHEN LLP**  
909 Third Avenue, 27<sup>th</sup> Floor  
New York, New York 10022  
Telephone: (212) 735-8600  
[jgottlieb@morrisoncohen.com](mailto:jgottlieb@morrisoncohen.com)  
[dross@morrisoncohen.com](mailto:dross@morrisoncohen.com)  
[ayarm@morrisoncohen.com](mailto:ayarm@morrisoncohen.com)

*Attorneys for Defendants Jason R. Anderson, Jacob S. Anderson, Schad E. Brannon, Roydon B. Nelson, and Relief Defendants Business Funding Solutions, LLC; Blox Lending, LLC; The Gold Collective LLC; and UIU Holdings, LLC*

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**IN THE UNITED STATES DISTRICT COURT  
THE DISTRICT OF UTAH, NORTHERN DIVISION**

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SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING INC. (d/b/a “DEBT  
Box”), a Wyoming corporation;  
JASON R. ANDERSON, an individual;  
JACOB S. ANDERSON, an individual;  
SCHAD E. BRANNON, an individual;  
ROYDON B. NELSON, an individual;  
JAMES E. FRANKLIN, an individual;

**MOTION FOR *PRO HAC VICE*  
ADMISSION OF DAVID E. ROSS**

Case No. 2:23-cv-00482-RJS

Judge Robert J. Shelby

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WESTERN OIL EXPLORATION  
COMPANY, INC., a Nevada corporation;  
RYAN BOWEN, an individual;  
IX GLOBAL, LLC, a Utah limited liability  
company;  
JOSEPH A. MARTINEZ, an individual;  
BENJAMIN F. DANIELS, an individual;  
MARK W. SCHULER, an individual;  
B & B INVESTMENT GROUP, LLC (d/b/a  
“CORE 1 CRYPTO”), a Utah limited  
liability company;  
TRAVIS A. FLAHERTY, an individual;  
ALTON O. PARKER, an individual;  
BW HOLDINGS, LLC (d/b/a the “FAIR  
PROJECT”), a Utah limited liability  
company;  
BRENDAN J. STANGIS, an individual; and  
MATTHEW D. FRITZSCHE, an individual,

Defendants,

ARCHER DRILLING, LLC, a Wyoming  
limited liability company;  
BUSINESS FUNDING SOLUTIONS, LLC,  
a Utah limited liability company;  
BLOX LENDING, LLC, a Utah limited  
liability company;  
CALMFRTIZ HOLDINGS, LLC, a Utah  
limited liability company;  
CALMES & CO, INC., a Utah corporation;  
FLAHERTY ENTERPRISES, LLC, an  
Arizona limited liability company;  
IX VENTURES FZCO, a United Arab  
Emirates company;  
PURDY OIL, LLC, a Nebraska limited  
liability company;  
THE GOLD COLLECTIVE LLC, a Utah  
limited liability company; and  
UIU HOLDINGS, LLC, a Delaware limited  
liability company,

Relief Defendants.

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I, Matthew R. Lewis, of the law firm Kunzler Bean & Adamson, PC, hereby move for the *pro hac vice* admission of David E. Ross (“Applicant”) as counsel for Defendants Jason R. Anderson, Jacob S. Anderson, Schad E. Brannon, and Roydon B. Nelson (collectively, the “Defendants”), as well as Relief Defendants Business Funding Solutions, LLC; Blox Lending, LLC; The Gold Collective LLC; and UIU Holdings, LLC (collectively, the “Relief Defendants”) in the above-referenced matter, and I consent to serve as local counsel. The Application is attached hereto as Exhibit A; the proposed Order has been submitted herewith; and the admission fee will be paid to the Court at the time of filing. I certify that the Applicant is not a member of the Utah State Bar, does not maintain a law office in Utah, and has not been admitted to *pro hac vice* in any case in this district in the previous 5 years.

DATED this 16th day of August, 2023.

**KUNZLER BEAN & ADAMSON, PC**

/s/ Matthew R. Lewis

Matthew R. Lewis

Taylor J. Smith

*Attorneys for Defendants Jason R. Anderson, Jacob S. Anderson, Schad E. Brannon, Roydon B. Nelson, and Relief Defendants Business Funding Solutions, LLC; Blox Lending, LLC; The Gold Collective LLC; and UIU Holdings, LLC*

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on this 16th day of August, 2023, I caused a true and correct copy of the foregoing **MOTION FOR *PRO HAC VICE* ADMISSION OF DAVID E. ROSS** to be submitted for electronic filing through the Court's CM/ECF system and accordingly served on the following:

Michael E. Welsh (*pro hac vice* pending)  
Casey R. Fronk (*pro hac vice* pending)  
**SECURITIES AND EXCHANGE COMMISSION**  
351 South West Temple, Suite 6.100  
Salt Lake City, UT 84101  
Telephone: (801) 524-5796  
[welshmi@sec.gov](mailto:welshmi@sec.gov)  
[fronkc@sec.gov](mailto:fronkc@sec.gov)

*Attorneys for Plaintiff Securities and Exchange Commission*

Jose A. Abarca  
Romaine C. Marshall  
**POLSINELLI PC**  
2825 E. Cottonwood Parkway, Suite 500  
Salt Lake City, Utah 84121  
Telephone: (801) 999-3500  
[jabarca@polsinelli.com](mailto:jabarca@polsinelli.com)  
[rmarshall@polsinelli.com](mailto:rmarshall@polsinelli.com)

*Attorneys for Defendants IX Global, LLC, Joseph A. Martinez, Travis A. Flaherty, and Relief Defendant Flaherty Enterprises, LLC*

Andrew William Balthazor (admitted *pro hac vice*)  
**HOLLAND & KNIGHT LLP**  
701 Brickell Avenue, Suite 3300  
Miami, Florida 33131  
Telephone: (305) 374-8500  
Email: [andrew.balthazor@hklaw.com](mailto:andrew.balthazor@hklaw.com)

Jessica B. Magee (admitted *pro hac vice*)

Scott Mascianica (admitted *pro hac vice*)

**HOLLAND & KNIGHT LLP**

1722 Routh Street, Suite 1050

Dallas, Texas 75201

Telephone: (214) 969-1700

[Jessica.Magee@hklaw.com](mailto:Jessica.Magee@hklaw.com)

[Scott.Mascianica@hklaw.com](mailto:Scott.Mascianica@hklaw.com)

Eric K. Schnibbe

Jason A. McNeill

McNeill Von Maack

175 South Main Street, Suite 1050

Salt Lake City, Utah 84111

Telephone: (801) 823-6464

[schnibbe@mvmlegal.com](mailto:schnibbe@mvmlegal.com)

[mcneill@mvmlegal.com](mailto:mcneill@mvmlegal.com)

*Attorneys for Receiver Josias N. Dewey*

/s/ Michelle Hansen

Michelle Hansen